

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FILED

FEB 18 2020

UNITED STATES OF AMERICA

v.

MICHAEL MARLETTE

Criminal No.

20-47

(18 U.S.C. §§ 2252(a)(4)(B)  
and 2252(b)(2))

[UNDER SEAL]

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

INDICTMENT

COUNT ONE

The grand jury charges:

On or about April 19, 2018, in the Western District of Pennsylvania, the defendant, MICHAEL MARLETTE, did knowingly possess visual depictions, namely, videos and images in computer graphic and digital files, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict prepubescent minors and minors who have not attained 12 years of age, engaging in sexually explicit conduct, all of which had been shipped and transported in interstate and foreign commerce, specifically by means of a computer.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**FORFEITURE ALLEGATIONS**

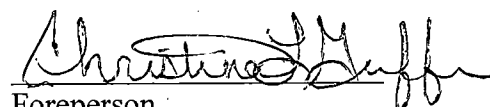
1. The grand jury re-alleges and incorporates by reference the allegations contained in Count One of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3).

2. As a result of the knowing commission of the violation charged in Count One of this Indictment, the defendant, MICHAEL MARLETTE, did use the following to commit or to promote the commission of said violation, and this property is subject to forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3):

- a. one Compaq Presario laptop computer, bearing serial number 2CE836SB73;
- b. one IBM laptop computer, bearing serial number 78-ALMK6;
- c. one Dell laptop computer, bearing serial number HT90F41;
- d. one Compaq computer, bearing serial number 3D21KKLNR0D9;
- e. one IBM central processing unit, bearing serial number KCN8TVD;
- f. one Apple iPad, bearing serial number F9FR5CUEFLMJ;
- g. one Apple iPhone;
- h. one Buffalo external hard drive, bearing serial number 25578624401965; and
- i. two Thumb Drives.

Wherefore, the United States will seek forfeiture of the above-listed property.

A True Bill,

  
Foreperson

  
SCOTT W. BRADY  
United States Attorney  
PA ID No. 88352